



Koppers Performance Chemicals

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April 5, 2022

US Environmental Protection Agency
Attn: Aidan Fife
Document Processing Desk (AMEND)
Office of Pesticide Programs (7504P)
1200 Pennsylvania Ave. NW
Washington, DC 20460

**Re: InPro DCOI Wood Preservative, EPA Reg. No. 3008-133
Label amendment per Agency request**

Enclosed is an application to amend the **InPro DCOI Wood Preservative (EPA Reg. No. 3008-134)** label. The changes are per a request from the Agency communicated via email on March 23, 2022. Specifically, the email requested the following changes.

1. Update to reflect appropriate PPE based on acute tox profile

Koppers response: We revised the precautionary statements to be consistent with other DCOIT-containing products. The PPE is consistent with the proposed label for 3008-RGA and Penta labels.

2. Input engineering controls

For example: "For elevated temperature pressure treatment with PRODUCT NAME, automatic, remotely operated devices must be used to open, close, lock and unlock cylinder doors.

For ambient PRODUCT NAME treatments, an automatic locking/unlocking device must be used to accomplish locking and unlocking of the cylinder door."

Koppers response: We used language found on the UP-50 (83997-14) label. However we omitted the statement "All wooden members must be free of bark before receiving treatment." because we did not think it was applicable.

3. Reduce usage rate to 1-3% by weight of product active ingredient in the final treatment solution
 - a. *Koppers response: Rate was updated.*
4. Include use dilution table with mixing instructions
 - a. *Koppers response: We revised the label to provide instructions to make a temporary concentrate and then the treating solution. We also removed the above ground (residential) uses that is mixed with water because AWPA does not recognize a DCOI-only system.*

Please find the following documents to support this application:

1. Application, form 8570-1; and
2. Proposed labels in pdf format (clean and highlighted versions).

If you have any questions regarding this submission, please contact me. I may be reached by phone at 770-233-4244 or by email at RichardsonLA@Koppers.com.

Sincerely,

A handwritten signature in blue ink that reads "Leigh Ann Richardson". The signature is written in a cursive, flowing style.

Leigh Ann Richardson
Sr. Manager Regulatory Affairs